

KML Law Group, P.C.

A Professional Corporation incorporated in Pennsylvania

216 Haddon Avenue, Suite 406

Westmont, NJ 08108

(215) 627-1322

Attorneys for Specialized Loan Servicing LLC as servicer for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-HE4

IN THE MATTER OF:

Ana Maria Recinos

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 7
CASE NO. 19-14606 MBK

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

TO:

Ana Maria Recinos

1807 Silver Court

Trenton, NJ 08690

Paola D. Vera

Vera, Paola D.

Cabanillas & Associates PC

120 Bloomingdale Rd., Ste 400

White Plains, NY 10605

MCDONNELL, JOHN MICHAEL

115 Maple Avenue (VIA ECF)

Suite 201

Red Bank, NJ 07701

US TRUSTEE

Office of the US Trustee

One Newark Center, Suite 2100

Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Specialized Loan Servicing LLC as servicer for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2006-HE4**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **U. S. Courthouse, 402 East State Street; Trenton, NJ**, for an Order to Grant Relief from the Automatic

Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **1807 Silver Court, Trenton NJ 08690**. The hearing on this matter is scheduled for **April 22, 2019 at 10:00 A.M.**

/s/ Denise Carlon, Esq.

Denise Carlon, Esquire

Brian C. Nicholas, Esquire

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Attorney for Specialized Loan Servicing LLC as servicer
for Deutsche Bank National Trust Company, as Trustee
for Morgan Stanley ABS Capital I Inc. Trust 2006-HE4

Dated: March 28, 2019